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September 10, 1997

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***By Hand Delivery***

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

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SEP 10 1997

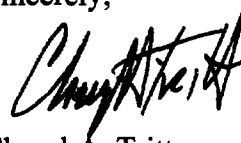
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Erratum*  
*IB Docket No. 96-111;* ✓  
*CC Docket No. 93-23 (RM-7931);*  
*File No. ISP-92-007*

Dear Mr. Caton:

ICO Global Communications ("ICO"), through its counsel, submits the attached Erratum to the Reply of ICO Global Communications to Further Comments, originally filed on September 5, 1997. Footnote 14 of ICO's Reply inadvertently contained incorrect information. A new page 8 reflecting the deletion of this information is attached to the Erratum.

Sincerely,



Cheryl A. Tritt  
Counsel for ICO Global Communications

cc: Service list attached

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

In the Matter of )

Amendment of the Commission's )  
Regulatory )  
Policies to Allow Non-U.S.-Licensed Space )  
Stations to Provide Domestic and )  
International )  
Satellite Service in the United States )

and )

Amendment of Section 25.131 of the )  
Commission's Rules and Regulations to )  
Eliminate the Licensing Requirement for )  
Certain International Receive-Only Earth )  
Stations )

and )

COMMUNICATIONS SATELLITE )  
CORPORATION )  
Request for Waiver of Section 25.131(j)(1) )  
of the Commission's Rules As It Applies to )  
Services Provided via the INTELSAT K )  
Satellite )

IB Docket No. 96-111

CC Docket No. 93-23  
RM-7931

File No. ISP-92-007

ERRATUM TO  
REPLY OF ICO GLOBAL COMMUNICATIONS  
TO FURTHER COMMENTS

ICO Global Communications ("ICO") submits this erratum to its Reply filed on September 5, 1997 in the above-captioned proceeding. Specifically, footnote 14 of ICO's Reply inadvertently contained incorrect information. A new page 8 reflecting the deletion of this information is attached.

Respectfully submitted,

By: 

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September 10, 1997

Inmarsat investors also participate in ICO as investor-partners, wholesalers and syndicated partners.<sup>14</sup>

As an entity managerially and structurally independent of Inmarsat, ICO enjoys no governmental privileges, immunities or other advantages of any kind.<sup>15</sup> An examination of the MSS experience so far demonstrates that ICO's competitors have had as much success as ICO in securing service agreements and strong partners in international markets.<sup>16</sup>

In addition to achieving structural and managerial independence from Inmarsat and its members, ICO has worked closely with the United States government to obviate any concerns about potential, anticompetitive advantages arising from ICO's origins in an Inmarsat project. Notably, in May of 1996, in connection with the COMSAT procurement application, ICO's board voted to incorporate in ICO's organic documents the Inmarsat Principles as requested by the United States Executive Branch. The Inmarsat Principles

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<sup>14</sup> NEC, along with a consortium of companies that includes Hughes Network Systems and Ericsson, also will deliver ICO's ground systems equipment under a contract estimated at approximately \$500 million. Hughes joined ICO in 1995 as a strategic partner and has a \$2.3 billion contract to build and launch ICO's space segment. In addition, ICO is likely to broaden its ownership structure through various means, including an initial public offering.

<sup>15</sup> In most of the large countries or groups of countries where ICO will operate, including China, the European Union, India and Russia, the entity that will make the regulatory decisions concerning market access is entirely separate from the operational entities that are ICO investors. As a result, ICO expects to compete vigorously, on an equal footing with its competitors, to secure the full range of licenses and service provider relationships needed to provide global MSS service.

<sup>16</sup> In fact, Edward Staiano, Chairman and Chief Executive Officer of Iridium, recently was asked whether "obtaining licensing and regulatory approval have been more difficult than [Iridium] expected." Mr. Staiano replied that "[n]o one has shut the door on us. In some areas the process has been more cumbersome and it's taken longer, [but] [w]e've also had some very pleasant surprises." *Space News*, Sept. 1-7, 1997.

## **CERTIFICATE OF SERVICE**

I, Kathryn Stasko, do hereby certify that the foregoing **ERRATUM TO  
REPLY OF ICO GLOBAL COMMUNICATIONS TO FURTHER COMMENTS** was  
hand delivered on this 10th day of September, 1997, to the following:

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